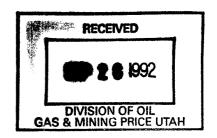


P.O. BOX 902 PRICE, UTAH 84501 PHONE (801) 637-5385 TELECOPIER (801) 637-8860



September 28, 1992

State of Utah
Department of Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Attn.: Pamela Grubaugh-Littig,

Permit Supervisor

Re.:

ÁCT 007/038-92 (A)

Dear Ms. Littig:

Enclosed is Andalex's response to deficiencies noted by Mr. Ken Wyatt of your staff. I have discussed the issues with Mr. Wyatt and I believe the changes included herein should address his questions.

Please call me with any comments.

Sincerel

Michael W. Glasson

Senior Geologist

MWG/as

Enclosures

cc: File

BEGRINEID

SEP 3 0 1992

DIVISION OF OIL GAS & MINING



Dianne R. Nielson, Ph.D. Division Director

Executive Director

State of Utal DEPARTMENT OF NATURAL RESOURCES DIVISION OF OIL. GAS AND MINING

355 West North Temple

3 Triad Center, Suite 350 Salt Lake City, Utah 84180-1203 801-538-5340

October 7, 1992

TO:

Pamela Grubaugh-Littig, Permit Supervisor

FROM:

Ken Wyatt, Reclamation Hydrologist

RE:

Review of September 30, 1992 Response to Division Order DO-92A,

Andalex Resources, Wildcat Loadout, ACT\007\033, Folder #3, Carbon

County, Utah

SYNOPSIS

On June 16, 1992, the Division issued Division Order #DO-92A to Andalex Resources for permit defects discovered during the June 1992, complete inspection at the Wildcat Loadout. Andalex submitted a response to this Division Order on August 3. 1992, which was reviewed and required more information as requested on August 17, 1992. A second submittal was received on September 30, 1992. This memo serves to review this most recent submittal.

ANALYSIS

The original Division Order consisted of 7 permit deficiencies which required additional information, maps, or certifications. All items except number 4, 5 and 7 were satisfied. The remaining deficiency item is listed below in bold type followed by review of the operator's response.

REMAINING DEFICIENCY ITEM

- The text references the refuse pile information in Appendix P page 147-F, whereas the submittal includes this information in Appendix O. The Table of Contents in Volume 1 of the MRP only lists appendices A though N. This discrepancy should be corrected. The operator submitted corrected Table of Contents, page xiii, with Appendix O included and page 147-F referencing Appendix O instead of Appendix P. This satisfies item 4.
- Additional data is required for cross section tabulation in tables IV-5a. 12 and IV-13. This information includes for each diversion, channel bottom width, channel top width, channel depth, and flow depth.

Page 2 Memo/PGL ACT/007/033 October 7, 1992

This information is required so that a person can define the channel shape from the information listed in the cross section tabulation.

The corresponding text sections need to be corrected to eliminate the statement about maintaining the minimal cross sectional areas from table IV-12 and IV-13.

The operator submitted updated tables IV-12 and IV-13 supplying the requested ditch configuration information. This information was checked using the Flowmaster program which demonstrated that the ditch configurations in these tables are adequate to handle the volumes of water listed.

The operator did not change the language regarding maintaining minimal cross sectional areas, however, since the tables have been enlarged to include ditch specific design information this language may remain as a commitment by the operator to maintain these ditches. Item 5 is satisfied.

7. Andalex needs to provide a method to de-watering this area should it accumulate water. A method of monitoring for water accumulation and a system for decanting or pumping watering is required for the depression area below the two cell of the permanent impoundment. The operator submitted revised page 112-A which describes the methods that will be used to monitor water accumulation and a method of dewatering accumulated water. A steel post will be installed in the lowest area of the depression. A mark on the steel post two feet above the ground will signal when dewatering will begin. Pumps approved for decanting the sediment ponds will be used to dewater this area as described in the MRP on page 92. This satisfies item 7.

RECOMMENDATION

The September 30, 1992 submittal adequately satisfies the remaining items from Division Order 92A. I recommend that the Division Order be considered completed and that this information be approved and incorporated into the mine plan.